

THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

REX – REAL ESTATE EXCHANGE, INC.,

Plaintiff,

v.

ZILLOW, INC., et al.

Defendants.

Case No. 2:21-cv-00312-TSZ

**DECLARATION OF CARL E.
GOLDFARB IN SUPPORT OF REX'S
OPPOSITION TO ZILLOW'S MOTION
FOR PROTECTIVE ORDER**

DECLARATION OF CARL E. GOLDFARB

I, Carl E. Goldfarb, declare as follows:

1. I am a partner with the law firm Boies Schiller Flexner LLP, counsel for Plaintiff in this matter. I am an attorney at law duly licensed to practice before all courts of the State of Florida, and admitted *pro hac vice* in this case. Dkt No. 131. I have personal knowledge of the matters set forth herein and am competent to testify.
2. Attached hereto as **Exhibit A** is a true and correct copy of document bearing Bates stamp ZG_00294981
3. Attached hereto as **Exhibit B** is a true and correct copy of document Bearing Bates stamp NAR0024187.
4. Attached hereto as **Exhibit C** is a true and correct copy of the May 2020 Zillow Investor Relation Presentation.
5. Attached hereto as **Exhibit D** is a true and correct copy of document bearing Bates stamp ZG_00002168.
6. Attached hereto as **Exhibit E** is a true and correct copy of document bearing Bates stamp ZG_00306487.
7. Attached hereto as **Exhibit F** is a true and correct copy of document bearing Bates stamp ZG_00429485.
8. Attached hereto as **Exhibit G** is a true and correct copy of a Wall Street Journal Article dated May 10, 2019.
9. Attached hereto as **Exhibit H** is a true and correct copy of a document bearing Bates stamp NAR0027182.
10. Attached hereto as **Exhibit I** is a true and correct copy of a document bearing Bates stamp ZG_00278095.
11. Attached hereto as **Exhibit J** is a true and correct copy of a document bearing Bates stamp ZG_00691365.

1 12. Attached hereto as **Exhibit K** is a true and correct copy of Zillow Objections and
2 Responses to REX's Third Set of Interrogatories.

3 13. Attached hereto as **Exhibit L** is a true and correct copy of Zillow Objections and
4 Responses to REX's Fourth Set of Interrogatories.

5 14. Attached hereto as **Exhibit M** are excerpts from the Deposition of Mathew Hendricks
6 on April 5, 2023.

7 15. Attached hereto as **Exhibit N** is a true and correct copy of an email from REX's
8 counsel, dated April 14, 2023.

9 16. Attached hereto as **Exhibit O** is a true and correct copy of a document bearing Bates
10 stamp ZG_00004833.

11 17. Attached hereto as **Exhibit P** is a true and correct copy of a document bearing Bates
12 stamp ZG_00533471.

13 18. Attached hereto as **Exhibit Q** is a true and correct copy of a document bearing Bates
14 stamp ZG_00680780.

15 19. Attached hereto as **Exhibit R** is a true and correct copy of a document bearing Bates
16 stamp ZG_00145650.

17 20. Attached hereto as **Exhibit S** is a true and correct copy of 2022 - Form 10K – Quarter 4

18 21. Attached hereto as **Exhibit T** is a true and correct copy of a document bearing Bates
19 stamp ZG_00262313.

20 22. Attached hereto as **Exhibit U** is a true and correct copy of a document bearing Bates
21 stamp ZG_00213663

22 I declare under penalty of perjury under the laws of the United States of America that
23 the foregoing is true and correct.

24 Executed on April 24, 2023, at Seattle, Washington.

25 /s/ Carl E. Goldfarb
26 Carl E. Goldfarb (admitted *pro hac vice*)
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